

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Joseph Di Cosola, Individually and on)	
behalf of a class,)	
Plaintiffs,)	Case No. 07 C 6755
)	
v.)	The Honorable John W. Darrah
)	
Palmet Venture, LLC, d/b/a 312 Chicago,)	Magistrate Michael T. Mason
)	
Defendants.)	

**UNOPPOSED MOTION FOR (1) EXTENSION OF TIME FOR PALMET VENTURE
LLC TO RESPOND TO PLAINTIFF'S COMPLAINT, AND (2) EXTENSION OF TIME
FOR PALMET TO MAKE RULE 26(A) (1) DISCLOSURES**

Defendant Palmet Venture, LLC ("Palmet"), by its respective undersigned counsel, respectfully moves this Court for an order extending the time for Palmet to answer or otherwise respond to the *Complaint* and extending the time for Palmet to make Rule 26(a)(1) disclosures through April 25, 2008. In support of this unopposed motion, Palmet states as follows:

1. The parties are currently conducting settlement negotiations and need through April 25, 2008 to conduct negotiations.
2. On February 6, 2008, the Court set a February 27, 2008 deadline for the parties to make Rule 26(a)(1) disclosures. On the same date, the Court set the same deadline for Palmet to respond to the *Complaint*.
3. On February 22, 2008, the Court granted an extension to Palmet through April 3, 2008 to respond to the *Complaint* and make Rule 26(a)(1) disclosures.
4. The parties have been diligently conducting settlement negotiations.
5. The likelihood of settlement is enhanced if the parties are able to keep their fees and costs to the minimum at this juncture.

6. The Court's resources would be used most efficiently if the parties were given additional time to complete settlement discussions.

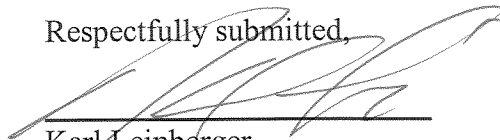
7. Additionally, Palmet's resources would be used inefficiently if it was required to make Rule 26(a)(1) disclosures only to have the case settle soon afterwards. Similarly, Palmet's resources would be used inefficiently if it were required to respond to the *Complaint* only to have the case settle soon afterwards.

8. This is the third agreed extension between Di Cosola and Palmet regarding a response to the *Complaint*. This is the second agreed extension of the Rule 26(a)(1) deadline. Neither extension will prejudice any party.

WHEREFORE, the parties respectfully request that the Court enter an order extending the time for Palmet to answer or otherwise respond to the *Complaint* and also extending the time for Palmet to make Rule 26(a)(1) disclosures through April 25, 2008.

Dated: March 26, 2008

Respectfully submitted,



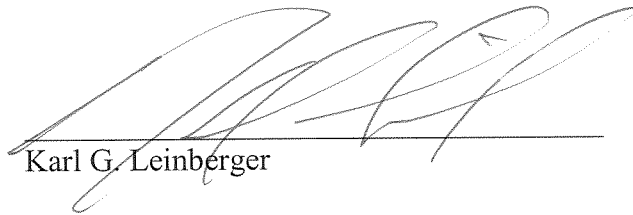
Karl Leinberger
One of the attorneys
for Palmet Venture, LLC

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CERTIFICATE OF SERVICE

Karl Leinberger, an attorney for Palmet Venture, LLC, hereby certifies that he caused a true and correct copy of the foregoing *Unopposed Motion For (1) Extension Of Time For Palmet Venture LLC To Respond To Plaintiff's Complaint, and (2) Extension Of Time For Palmet To Make Rule (26)(a)(1) Disclosures* to be served by via the ECF System for the United States District Court for the Northern District of Illinois before 5 p.m. on this 26th day of March, 2008, upon:

Anthony G. Barone
David M. Jenkins
Barone & Jenkins, P.C.
635 Butterfield Road, Suite 145
Oakbrook Terrace, IL 60181



Karl G. Leinberger